Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	GN Docket No. 13-111
Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities	)	

To the Commission:

INITIAL COMMENTS OF CELLBLOX ACQUISITIONS, LLC

Paul C. Besozzi
Squire Patton Boggs (US) LLP
2550 M Street, NW
Washington, D.C. 20037
(202) 457-5292
Counsel to CellBlox Acquisitions, LLC

Daniel Wigger
Vice President and Managing Director,
Wireless Containment Solutions
CellBlox Acquisitions, LLC
4000 International Parkway
Carrollton, Texas 75007
(972) 277-0752

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CellBlox Acquisitions, LLC ("CellBlox" or "Company"), acting with counsel and pursuant to the Commission's Report and Order and Further Notice of Proposed Rulemaking, adopted March 23, 2017, in this Docket,[1] hereby respectfully submits its initial comments, focusing on two issues raised in the FNPRM: (1) termination of service to contraband wireless devices pursuant to qualifying requests and (2) the need for coordination and advance information on wireless carrier network changes.

I. INTRODUCTION AND SUMMARY

As the Commission well knows, the continued and increasing use of contraband wireless devices in our nation's prisons and jails presents a threat to the safety of correctional officials and to the public at large. The Company continually hears from its correctional facility customers that the use of such devices represents the most critical challenge they deal with on a

[1] *In the Matter of Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities*, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 2336 (2017) ("R&O" and "FNPRM"). CellBlox's comments are timely filed in accordance with the Federal Register publication of the FNPRM. 82 Fed Reg. 22780, May 18, 2017.

daily basis. CellBlox commends the Commission's actions in the R&O. CellBlox and other providers of Contraband Interdiction Systems ("CIS") will now benefit from the streamlined regulatory processes (e.g., elimination of separate lease modifications filings, immediate processing and approval of spectrum leases) and the naming of an Ombudsman to address CIS issues.

However, CellBlox believes that to further enhance the effectiveness of CIS there should be a reliable and accurate process for entirely terminating service to contraband wireless devices identified by CIS in the correctional facility. Further, to avoid any potential interruption of CIS operations as a result of wireless carrier network modifications or upgrades, the Commission should adopt reasonable procedures for advising CIS providers in advance of those actions. CellBlox outlines below its positions on each of these key issues.

II. BACKGROUND INFORMATION ON CELLBLOX SERVICES

CellBlox continues to be the leader in the deployment of Wireless Containment Solutions ("WCS") systems which can be described as enhanced managed access and classified as CIS. These systems control and manage contraband wireless device use at correctional facilities through the proprietary design and implementation of a specialized Micro/Small Cell Network that is integrated with a Distributed Antenna System ("DAS"). CellBlox then manages the systems on behalf of the facility as a service. CellBlox prides itself in constantly assessing each deployment, remotely monitoring site performance, providing a user interface ("UI") for correctional facility staff and leadership, and enhancing each system as necessary to essentially replicate internally the commercial mobile network at each facility location.

To date CellBox has deployed WCS systems in the facilities of two (2) State Department of Corrections ("DOC") and is in the process of adding WCS sites at the facilities of a third

DOC. In 2017 year-to-date, the Company's five (5) WCS systems in-service have prevented over 510,000 calls and 45,000 texts from reaching the commercial wireless networks. Crimes have been prevented, lives have been saved, and correctional facility officers have experienced increased safety as a result.

CellBlox is in the process of adding five (5) WCS systems this year (under contract) and expects contracts for six (6) more WCS sites at DOCs targeted for 2018 deployment. The CellBlox WCS system works, works well, and aids correctional facilities today. Due to the Commission's actions in the R&O, the installation interval of each future WCS system will decrease by fostering a cooperative environment for CIS providers with all stakeholders involved in each deployment.

III. THE COMMISSION SHOULD ADOPT RULES REGARDING TERMINATION OF SERVICES TO CONTRABAND WIRELESS DEVICES

CellBlox strongly believes that service to contraband wireless devices that are detected should be terminated entirely and such devices should be rendered totally unusable. CellBlox understands and agrees that standards should be set for what information is sufficient to establish that the particular device qualifies for such termination (i.e., a qualifying request). CellBlox supports a process that facilitates timely service terminations as outlined in the FNPRM from CIS eligible systems providing qualifying requests.

CellBlox's WCS systems are capable of recording and providing correctional facilities with substantial information concerning the identity and usage patterns of known contraband wireless devices operating from within a facility. Previously, the Company found the process of gathering and making proper use of this information to be overly burdensome or complex if solely reliant upon the use of wireless ("CMRS") licensee information with detection only systems. Now, and with further actual operating experience, CellBlox believes that information

generated from a WCS system can be used by correctional facilities to forward detailed qualifying requests to CMRS licensees that contain substantial evidence of and about a contraband wireless device operating illegally within a facility. This evidence can be matched with CMRS licensee data regarding the contraband wireless device and can readily confirm the device is a contraband device, whose service should be terminated entirely.

CellBlox would welcome participation by all stakeholders involved in the process of generating qualifying requests and subsequent service terminations to participate in technical working groups to ensure that qualifying requests contain standard information from all CIS providers that clearly demonstrates the identity of a wireless device as illegal contraband. Standard information should include the contraband wireless device's identification and usage patterns as evidence that it is operated by an inmate or other unauthorized user when on the private, facility-based CIS. Permanent disabling of these devices would avoid the potential for inmates being able to move the devices in and out of the CIS coverage areas so that they can continue to access the CMRS licensees' networks.

III. THE COMMISSION SHOULD REQUIRE NOTIFICATION TO CIS PROVIDERS OF NETWORK MODIFICATIONS AND CHANGES

As a result of operating and enhancing WCS systems for several years CellBlox has experienced first-hand what unexpected CMRS licensee network changes can do to the real-time performance of those systems. Presently, most CIS providers use tools to scan for and detect CMRS licensee network changes and then must "react" to those changes by modifying the configuration of their systems (e.g., add radios, change radio access network ("RAN") protocols due to band/channel changes by the carrier). This reactive process can leave the CIS vulnerable to "releases" (i.e., ability of contraband devices to access the commercial wireless system) during the time it takes the provider to re-configure and/or modify its CIS to match the change

performed by the CMRS licensee on its network. CellBlox believes there is a relatively straightforward fix to avoid this potential problem, which can expose both correctional officers and the public to the danger of illicit use of contraband devices in the facility. .

CMRS licensees, for the most part, perform network studies and examine the performance of and capacity requirements of their networks as a regular and functional discipline within their business. These licensees are in the business of ensuring reliable and ubiquitous mobile access and seek to provide their consumers with superior quality and performance. CellBlox, which has associates on staff that have experience working at major CMRS licensees, understands the process that carriers go through to plan, obtain internal expenditure (e.g., capital spending) approvals, procure/purchase equipment, install that equipment, and other pre-change steps to enhance or maintain network performance. CellBlox recommends a process whereby CMRS licensees, once a planned network change is internally approved, must notify potentially affected CIS providers so that their systems can be reconfigured or modified in a similar "planned" manner. CellBlox believes that each CMRS licensee is aware of an operating CIS provider in each of its serving cell areas because of spectrum leases. A process in which notification of network changes is provided to those CIS providers in these same areas would ensure collaboration exists and minimize the prospect for CIS downtime.

CMRS licensees also must plan, submit for approval, and notify many parties today using internal change control practices. Why cannot CIS providers simply be a part of the notification distribution? Such a technical network change notification process would ensure proactive (versus reactive) network changes by CIS providers in that same serving cell area, thus ensuring against gaps in CIS protectiveness

CellBlox recommends a process whereby a CMRS licensee is required to provide a notification of network change to a CIS provider-designated individual, not less than 90 days in advance of the planned change. Covered planned changes would include the addition or deletion of RAN components, changes to the radio channel plan (i.e., band, protocol, channel), CMRS licensee spectrum swaps and retunes, capacity changes to existing channels, widening of existing channels and other similar network modifications.

CellBlox also understands that in certain instances CMRS licensees must make emergency network changes in reaction to unplanned events. In such circumstances, CellBlox would simply request notification of the change immediately after the occurrence to permit prompt focus on and a reconfiguration of its CIS at that facility to ensure contraband wireless devices can continue to be managed and prevented from accessing the CMRS licensee commercial network.

IV. CONCLUSION

The Commission's R&O is an excellent start toward facilitating the deployment of CIS that can address the scourge of contraband cellphones in correctional facilities. CellBlox would welcome and participate in technical working groups, under the guidance of the newly named FCC Ombudsperson, to further facilitate technical discussions and ultimately reach agreement on

the standards for a qualifying request for service termination and the circumstances and process for advance notification of technical network changes.

Respectfully submitted,

Daniel Wigger By PCB

Daniel Wigger
Vice President and Managing Director,
Wireless Containment Solutions
CellBlox Acquisitions, LLC
4000 International Parkway
Carrollton, Texas 75007
(972) 277-0752

Paul C. Besozzi
Patton Boggs LLP
2550 M Street, NW
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